

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

MILDRED ANNE DUDLEY,

Plaintiff,

v.

**MORGAN KEEGAN & COMPANY,
INC.**

Defendant.

**CIVIL ACTION FILE
NO. 1:11-CV-02700-RLV**

DEFENDANT’S RULE 68 OFFER OF JUDGMENT

Pursuant to Federal Rule of Civil Procedure 68, Defendant Morgan Keegan & Company, Inc. (“Morgan Keegan”) hereby offers to allow judgment to be taken against it by Plaintiff Mildred Anne Dudley on the claims asserted in Counts I and II of Plaintiff’s Complaint [Doc. No. 1] (i) in the total aggregate amount of \$70,299.44, inclusive of all damages of any kind or nature, including liquidated damages and interest, and (ii) in addition, for such reasonable attorneys’ fees, costs, and expenses to which Plaintiff is entitled by law, as determined by the Court.

Pursuant to Federal Rule of Civil Procedure 68, this Offer shall remain open for fourteen (14) days, to and including August 1, 2012, and thereafter it is and shall be deemed to be withdrawn with no further action required by Defendants. Plaintiff must accept this Offer in writing before the expiration of the Offer.

Evidence of this Offer is not admissible for any other purposes than to effect judgment under the specified terms, if the Offer is accepted, or in a proceeding to determine costs and attorneys' fees pursuant to Federal Rule of Civil Procedure 68. This Offer is made solely for the purposes specified in Federal Rule of Civil Procedure 68 and is not to be construed as an admission that Defendant is liable in this action or that Plaintiff has suffered any recoverable damage, all of which Defendant denies, and shall not be construed as a waiver of any rights that Defendant may otherwise have.

Respectfully submitted this 18th day of July, 2012.

/s/ David W. Long-Daniels
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*Attorneys for Defendant Morgan Keegan &
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CERTIFICATE OF SERVICE

This is to certify that I have this day served the foregoing by email and first class mail, postage prepaid, to the following counsel of record:

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Dated: July 18, 2012

/s/ David W. Long-Daniels (wqPNH)
Attorney for Defendant
Morgan Keegan & Company, Inc.